



Celia Nogales  
Director -  
Federal Regulatory

SBC Telecommunications, Inc.  
1401 I Street, N.W.  
Suite 1100  
Washington D.C. 20005  
Phone 202 326-8888  
Fax 202 408-4806

ORIGINAL

November 19, 1999

EX PARTE OR LATE FILED

RECEIVED

NOV 19 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Ex Parte Statement  
CC Docket 99-200**

Dear Ms. Salas:

On Thursday, November 18, 1999, Hope Thurrott, Gil Orozco, Bill Adair and I met with Yog Varma, Deputy Chief, Common Carrier Bureau, Blaise Scinto, Deputy Chief, Network Services Division, Patrick Forster, Network Services Division and John Spencer, Wireless Telecommunications Division to discuss SBC's position regarding number conservation issues. We also discussed a new proposal for NPA back-up relief, transitional non-LNP overlay (TNO). The attached material was used as part of our discussion.

Sincerely,

Celia Nogales  
Director - Federal Regulatory

Attachments

cc: Y. Varma  
B. Scinto  
P. Forster  
J. Spencer

No. of Copies rec'd 012  
List ABCDE

**SBC DIALING PLANS**  
(A/O 11-3-99)

STATE	LOCAL HNPA	10D LOCAL HNPA PERMISSIVE	1+10D LOCAL HNPA PERMISSIVE	LOCAL FNPA	TOLL HNPA	TOLL FNPA	"1" =Toll
AR	7D	YES	NO	10D	1+10D	1+10D	YES
CA	7D	NO	YES	1+10D	7D/1+10D	1+10D	NO
CT	7D	NO	NO	10D	1+10D	1+10D	YES
IL	7D	NO	YES***	1+10D	1+10D	1+10D	NO
IN	7D	NO	YES***	1+10D	1+10D	1+10D	NO
KS	7D	YES	NO	10D	1+10D	1+10D	YES
MI	7D	NO	YES***	1+10D	1+10D	1+10D	NO
MO	7D	YES	NO	10D	1+10D	1+10D	YES
NV	7D	NO	NO	1+10D	1+10D	1+10D	NO
OH	7D	NO	YES***	1+10D	1+10D	1+10D	NO/YES
OK	7D	YES	NO	10D	1+10D	1+10D	YES
TX	7D/10D*	YES**	NO	10D	1+10D	1+10D	YES
WI	7D	NO	YES	1+10D	1+10D	1+10D	NO

It is worth noting that GTE uses the same dialing plan, using "1" as a toll indicator, as the SWBT 5 states--even in P\*B and Ameritech states that do not use the "1"!

\* 10D Local HNPA in Dallas (NPAs 214/469/972) and Houston (NPAs 281/713/832)

\*\* Still in process of completing 10D Local Permissive throughout entire state

\*\*\* Still in process of completing 1+10D Local Permissive throughout entire state

**NPAs EXHAUSTING 1999-2001**  
(Per 1999 NANPA COCUS issued 5-26-99)

STATE	NPA	EXHAUST DATE	STATUS	RELIEF PLAN APPROVED	JEOPARDY / MTHLY ALLOC.	SPARE NXXs (A/O NANPA 10-22-99)
California	310	2Q1998	OVERLAY SUSPENDED	Yes / Overlay	Yes / 2	21
	408	2Q1999	MANDATORY SUSPENDED	Yes / Overlay	Yes / 6	162
	415	4Q2000	ALJ REC SUSPEND	Yes / Overlay	Yes / 10	127
	510	1Q2001	ALJ REC SUSPEND	Yes / Overlay	Yes / 9	183
	530	4Q2000	ACTIVE PLANNING	No	Yes / 5	186
	562	4Q2001	AT CPUC	No	No	273
	619	1Q2000	PENDING IMPLEMEN.	Yes / 3-Way Split	Yes / 11	47
	626	2Q2001	ACTIVE PLANNING	No	Yes / 8	308
	650	2Q2001	ALJ REC SUSPEND	Yes / Overlay	Yes / 11	196
	707	2Q2001	ALJ REC 3-WAY SPLIT	No	Yes / 9	192
	714	1Q2001	ALJ REC SUSPEND	Yes / Overlay	Yes / 9	145
	760	2Q2001	PENDING IMPLEMEN.	Yes / Split	Yes / 8	171
	818	1Q2001	PENDING IMPLEMEN.	Yes / Split	Yes / 8	140
	909	3Q2000	ALJ REC SUSPEND	Yes / Split w/Overlay	Yes / 7	97
	925	2Q2000	AT CPUC	No	Yes / 11	285
Connecticut	203	2Q2001	PENDING IMPLEMEN.	Yes / Overlay	Yes / 6	115
	860	4Q2000	PENDING IMPLEMEN.	Yes / Overlay	Yes / 7	133
Illinois	312	3Q2000*	PENDING IMPLEMEN.	Yes / Overlay	Yes / - NA -	139
	630	1Q2000	PENDING IMPLEMEN.	Yes / Overlay	Yes / - NA -	73
	708	4Q2000	PENDING IMPLEMEN.	Yes / Overlay	Yes / - NA -	163
	773	2Q2001	PENDING IMPLEMEN.	Yes / Overlay	Yes / - NA -	182
	847	4Q1999	PENDING IMPLEMEN.	Yes / Overlay	Yes / - NA -	39
Indiana	219	1Q2000*	AT IURC	No	Yes / 3	76
	765	4Q2001	PENDING PLANNING	No	No	291
Missouri	314	2Q2001**	ACTIVE PLANNING	No	No	170
	816	2Q2001	ACTIVE PLANNING	No	No	150
Ohio	330	3Q2000	AT COMMISSION	No	No	192
	440	4Q2001	ACTIVE PLANNING	No	No	324
Texas	409	4Q2000	PENDING IMPLEMEN.	Yes / 3-Way Split	No	125
	817	4Q2000	AT TPUC	No	Yes / 8	92
Wisconsin	414	4Q2000	IMPLEMENTATION	Yes / Split	Yes / 5	48
	920	1Q2001	ACTIVE PLANNING	No	No	254

\*Exhaust date modified by NANPA after issuance of COCUS

\*\*NANPA estimated exhaust calculated during relief planning process

\*\*\*Per SBC Forecasted Exhaust calculated 6-1-99

**NPA's EXHAUSTING 2002-2005**  
(Per 1999 NANPA COCUS issued 5-25-99)

STATE	NPA	EXHAUST DATE	STATUS	RELIEF PLAN APPROVED	JEOPARDY	SPARE NXXs (A/O NANPA 10-22-99)
California	209	4Q2002*	ACTIVE PLANNING	No	Yes / 7	281
	323	3Q2002	ACTIVE PLANNING	No	Yes / 7	236
	559	4Q2004	ACTIVE PLANNING	No	Yes / 8	300
	661	1Q2005	NO ACTIVITY	No	No	458
	805	3Q2004	ACTIVE PLANNING	No	No	246
	916	1Q2002	AT CPUC	No	Yes / 8	222
	949	2Q2002	ACTIVE PLANNING	No	Yes / 10	379
Connecticut	- NA -	- NA -	- NA -	- NA -	- NA -	- NA -
Illinois	815	3Q2002	NO ACTIVITY	No	No	234
Indiana	317	3Q2002	NO ACTIVITY	No	No	202
	812	3Q2005	NO ACTIVITY	No	No	301
Missouri	- NA -	- NA -	- NA -	- NA -	- NA -	- NA -
Ohio	419	1Q2002	ACTIVE PLANNING	No	No	181
	513	1Q2002	ACTIVE PLANNING	No	No	111
	614	1Q2004	NO ACTIVITY	No	No	281
	740	4Q2004	NO ACTIVITY	No	No	348
	937	4Q2005	NO ACTIVITY	No	No	347
Texas	210	1Q2005	NO ACTIVITY	No	No	278
	214/469/972	4Q2003	NO ACTIVITY	No	No	740
	281/713/832	2Q2002	NO ACTIVITY	No	No	696
	361	2Q2005	NO ACTIVITY	No	No	500
	512	4Q2002	NO ACTIVITY	No	No	202
	903	2Q2003	NO ACTIVITY	No	No	243
	915	3Q2005	NO ACTIVITY	No	No	236
Wisconsin	715	3Q2003	NO ACTIVITY	No	No	279

\*Exhaust date modified by NANPA after issuance of COCUS

\*\*NANPA estimated exhaust calculated during relief planning process

\*\*\*Per SBC Forecasted Exhaust calculated 6-1-99

**NPAs EXHAUSTING AFTER 2005\***

(Per 1999 NANPA COCUS issued 5-26-99)

STATE	NPA	EXHAUST DATE	STATUS	RELIEF PLAN APPROVED	JEOPARDY	SPARE NXXs (A/O NANPA 10-22-99)
California	213	1Q2006	NO ACTIVITY	No	No	354
	831	2Q2006	NO ACTIVITY	No	No	508
	858	2010-2012**		No	No	Unavailable
Connecticut	- NA -	- NA -	- NA -	- NA -	- NA -	- NA -
Illinois	217	2Q2007	NO ACTIVITY	No	No	254
	309	4Q2009	NO ACTIVITY	No	No	368
	618	2Q2009	NO ACTIVITY	No	No	292
Indiana	- NA -	- NA -	- NA -	- NA -	- NA -	- NA -
Missouri	417	2Q2019	NO ACTIVITY	No	No	419
	573	2Q2016	NO ACTIVITY	No	No	372
	636	3Q2021***	NO ACTIVITY	No	No	605
	660	4Q2019	NO ACTIVITY	No	No	464
Ohio	216	3Q2008	NO ACTIVITY	No	No	337
Texas	254	2Q2040	NO ACTIVITY	No	No	518
	806	3Q2020	NO ACTIVITY	No	No	415
	830	4Q2014	NO ACTIVITY	No	No	506
	940	2Q2017	NO ACTIVITY	No	No	545
	956	1Q2007	NO ACTIVITY	No	No	488
Wisconsin	262	2005**	NO ACTIVITY	No	No	Unavailable
	608	2Q2009	NO ACTIVITY	No	No	364

\*Exhaust date modified by NANPA after issuance of COCUS

\*\*NANPA estimated exhaust calculated during relief planning process

\*\*\*Per SBC Forecasted Exhaust calculated 6-1-99

# **Number Conservation Issues SBC**

---

November 18, 1999  
FCC CC Docket No. 99-200, 96-98

# Why the State Petitions?

---

- Area code relief is unpopular
  - Repeated area code splits, in same area, results in confusion and frustration with regulators/customers
  - Area code splits require many customers to change their telephone numbers and confusing mix of 7/10D local dialing
  - Although no customer TN's change, overlays imposes an immediate 10-digit local dialing requirement
- As a result, 14 states have petitioned for additional numbering authority - 7 are in SBC's region
- Regulators looking for a "silver bullet" to end the need for NPA relief

# What is Happening with the Delegated Authority?

---

- Focus is on Thousand Block Number Pooling (TBNP) “trials”, code reclamation and utilization audits
- Some NPAs being targeted for TBNP may not be the best candidates
  - Projected benefits must be determined before NP is deployed
- NPAC Release 1.4 only viable option to use to meet state implementation requirements
- Trials and non-standard utilization reporting will increase industry/societal costs
- As additional state authority is granted, potential for delays with the national TBNP standard increases
  - Regulatory/Industry resources are being strained



# “Trials” Will Have Long Term Ramifications

---

- NPAC 1.4 is not the long term solution
  - May cause some service providers to unnecessarily add STP/SCP hardware capacity
  - Will adversely impact throughput
  - NPAC has indicated migration will be a major conversion to the more efficient NPAC 3.0 w/EDR
    - Database structure is completely changing to accommodate EDR
  - LNP systems will be down during conversion from NPAC 1.4 to 3.0
  - Down time will impact porting transactions and block activation's - customer/provider service affecting
- NPAC transition concerns can only be minimized with timely issuance of national number pooling order
  - Further state pooling trials should be avoided

# FCC Guidance Must Be Provided

---

- INC TBNP Guidelines must be adopted by the FCC
- TBNP should only be considered:
  - At deployment, NPA's exhaust projection is 12 months or more and can be extended by 2 or more years
  - In new NPAs in major metropolitan areas
- NPAs not meeting above criteria must implement NPA relief
- Coordinated, national implementation schedule must be developed - Roll-out cannot be a "flash cut"
  - SBC recommends 2 NPAs per region/quarter -- 56 NPAs/year
  - Block preparation for donation is extremely labor intensive, particularly with contaminated blocks-Illinois experience
  - Only donating pristine blocks for initial pool establishment could speed up pooling implementation
- Jeopardies must be the exception rather than the rule
  - Customer services needs must be met from the carrier of their choice

# Specific NPA Relief Back-up Plans Must be Required

---

- FCC must clarify that NPA relief back-up plans must be adopted with TBNP
  - Back-up plans must have a clearly defined implementation schedule
  - Illinois has adopted specific NPA back-up plans
- Back-up plan could be a transitional Non-LNP overlay (TNOs) to satisfy requirement
- Proposal works as follows:
  - Only non-LNP providers can request codes from TNO
  - Existing NPA's unassigned codes used only for TBNP
  - Once the last NXX is assigned in the pooled NPA, the TNO becomes a full service overlay
  - Permissive 10D dialing implemented coincident with TNO
  - Area code relief for wireline customers could be significantly delayed
    - No telephone number changes
    - Consumers dial 7-digits for local for an extended period of time

# Clear Cost Recovery Guidelines Must be Adopted

---

- Interim orders have not provided clear direction to the states regarding appropriate method of recovering TBNP costs
- FCC eventual preemption of state trials will cause confusion on how the costs should be handled
- FCC should eliminate existing uncertainties and reconsider state trial costs as interstate
- Cost recovery proceeding must precede national pooling implementation

Resolution of Other Important Issues  
are Necessary to Complete FCC  
Package

# Mandatory 10 Digit Local Dialing Impedes Efficient Area Code Relief

---

- The FCC ordered 10-digit local dialing with overlays to foster competition
  - Mandatory 10-D dialing is causing some regulators to avoid making decisions or less effective NPA relief decisions
    - Impacts new entrants ability to serve customers
  - LNP promotes competition without a 10 digit requirement
  - TBNP increases number supply in existing NPA
- Inconsistent local/toll dialing plans also impedes efficient relief plans
  - Clarity in the local dialing requirements between foreign NPAs may be a problem as well (overlays or splits)
  - 1+ is not used as a toll indicator in all states

# Utilization Reporting Standards Are Necessary

---

- Standard definition of number categories is critical for reporting utilization to determine block donations
- Unless consistent utilization standards are quickly adopted, interim studies:
  - Require the industry to develop case/case requirements to respond to regulators - incredibly time consuming and costly
  - Studies requested by FCC, Missouri, Texas, California, Illinois, etc.
  - Limits the ability of regulators/industry to aggregate and/or compare results--Carriers are reporting data differently
- Therefore, FCC should quickly adopt the NANC/INC recommended number categories and definitions

## In Summary...

---

- State “trials” will be costly to the industry and society and jeopardize a smooth national rollout of TBNP
- TBNP deployment schedule must be reasonable and focused on the NPAs that produce the highest benefit
- It must be clearly stated in FCC order that National standard preempts state trials and utilization reporting
  - Adopt INC/NANC recommendations for TBNP and utilization reporting
- Specific NPA relief requirements must be adopted with TBNP
  - Permitting a transition non-LNP overlay plan as the backup relief plan has several significant benefits
- All TBNP related costs should be treated as interstate and cost recovery rules clearly defined in the number pooling order
- Establish a national uniformed dialing plan